

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

STANZIALE & STANZIALE, P.C.

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Attorneys for Benjamin A. Stanziale, Jr., Trustee

In Re:

Alexa Gallagher,

Debtor.

Case No.: 19-23500-SLM

Judge: Hon. Stacey L. Meisel

Chapter: 7

Recommended Local Form:

☒ Followed

☐ Modified

APPLICATION FOR RETENTION OF PROFESSIONAL

1. The applicant, Benjamin A. Stanziale, Jr., is the

☒ Trustee: ☒ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☐ Debtor: ☐ Chap. 11 ☐ Chap. 13

☐ Official Committee of _____

2. The applicant seeks to retain the following professional, Peter A. Ouda, LLC, to serve
as:

☐ Attorney for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of _____

☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of _____

☒ Other Professional:

☐ Realtor ☐ Appraiser ☒ Special Counsel

☐ Auctioneer ☐ Other (specify): _____

3. The employment of the professional is necessary because: To prosecute a Personal Injury action on behalf of the Debtor.

4. The professional has been selected because: The attorney is fully familiar with the facts of the case.

5. The professional services to be rendered are as follows: Prosecution of the Personal Injury Case.

6. The proposed arrangement for compensation is as follows: In accordance with the attached fee agreement:

33-1/3% of the first \$750,000.00 recovered;
30% of the next \$750,000.00 recovered;
25% of the next \$750,000.00 recovered;
20% of the next \$750,000.00 recovered.

All amounts rendered in excess of the above will be by application.

7. To the best of the applicant's knowledge, the professional connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: Presently, the professional represents the Debtor in the prosecution of the Personal Injury action.

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. ' 101(14).

☒ does not represent or hold any interest adverse to the debtor or the estate
with respect to the matter for which he/she will be retained under 11
U.S.C. ' 327(e).

☐ Other; explain:

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

Wherefore, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Date: September 12, 2019

/s/Benjamin A. Stanziale, Jr.
Signature of Applicant

Benjamin A. Stanziale, Jr.
Name of Applicant